

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DAVID HANG

JENNIFER HANG

Pro Se

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Eric Adams

Mayor of the City of New York
Et AL.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

see attached

Complaint for a Civil Case

Case No.

CV 23-5570

(to be filled in by the Clerk's Office)

Jury Trial:

☒ Yes ☐ No
(check one)

CHEN, J.



POLLAK, M.J.

ORIGINAL

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>DAVID HANG & JENNIFER HANG</u>
Street Address	<u>4323 Colden Street APT 5H</u>
City and County	<u>FLUSHING QUEENS</u>
State and Zip Code	<u>NY 11355</u>
Telephone Number	<u>718-878-0727</u>
E-mail Address	<u>nycqueenstls@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Eric Adams</u>
Job or Title (if known)	<u>Mayor of the City of New York</u>
Street Address	<u>City Hall Park</u>
City and County	<u>New York</u>
State and Zip Code	<u>NY 10008</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Edward A. Caban</u>
Job or Title (if known)	<u>NYPD Commissioner</u>
Street Address	<u>1 Police Plaza Path</u>
City and County	<u>New York</u>

State and Zip Code NY 10008
 Telephone Number _____
 E-mail Address _____
 (if known) _____

Defendant No. 3

Name Deputy Inspector Louron E. Hall
 Job or Title Commanding Officer 109th Precinct
 (if known) _____
 Street Address City 3705 Union Street
 and County State Queens, NY
 and Zip Code 11354
 Telephone Number _____
 E-mail Address _____
 (if known) _____

Defendant No. 4

Name Lieutenant Catalano
 Job or Title NYPD 109th Precinct
 (if known) _____
 Street Address City 3705 Union Street
 and County State Queens NY
 and Zip Code 11354
 Telephone Number _____
 E-mail Address _____
 (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Fourth Amendment: The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On June 18th, 2022, at or around 11:15pm, the police from 109th precinct of NYPD led by Lieutenant Catalano illegally raided and searched Plaintiffs' home. No Search Warrant was produced or announced before, during or after the raid and search. Plaintiffs' constitutional and civil rights and home integrity were violated by NYPD. Plaintiffs were assaulted, insulted and violated by NYPD during the raid. As a result, Plaintiffs were physically and mentally hurt and injured. Plaintiffs' Fourth Amendment Rights were severely violated.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff respectfully implore the Court to enter an order to order Defendants to pay the damages of \$100,000 for each Plaintiff, in total of \$200,000 for the two plaintiffs, which includes the actual damages and punitive damages, to compensate Plaintiffs for the harm and sufferings they have had resulted from the wrong doing of NYPD, and any other damages the Court finds proper and just.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 24th, 2023.

Signature of Plaintiff

Printed Name of Plaintiff

David Hang Jennifer Hang
DAVID HANG JENNIFER HANG



ERIC L. ADAMS
MAYOR

CIVILIAN COMPLAINT REVIEW BOARD
100 CHURCH STREET 10th FLOOR
NEW YORK, NEW YORK 10007 ♦ TELEPHONE (212) 912-7235
www.nyc.gov/ccrb



ARVA RICE
INTERIM CHAIR

October 05, 2022

David Hang
4323 Colden Street Apt. 5H
Flushing, NY 11355

Re: CCRB case number 202204073

Dear David Hang:

Thank you for participating in the Civilian Complaint Review Board's mediation program. Since you mediated your complaint, the agency has closed your case file.

The purpose of mediation is to give you and the officer(s) an opportunity to speak about the incident and the complaint, to listen to each other, and to gain a better understanding of each other. The degree to which this happens is different in every case, but it happens nonetheless. We hope that you were satisfied with your participation in mediation.

If you should ever file another complaint against a New York City police officer, we hope that you will again consider resolving the complaint through mediation.

If you have any further questions about this matter, please call Caroline Hanna, Supervising Investigator of Special Operations at (212) 912-3480.

Sincerely,

Jonathan Darche
Executive Director



ERIC L. ADAMS
MAYOR

CIVILIAN COMPLAINT REVIEW BOARD
100 CHURCH STREET 10th FLOOR
NEW YORK, NEW YORK 10007 ♦ TELEPHONE (212) 912-7235
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ARVA RICE
INTERIM CHAIR

October 05, 2022

Jennifer Hang
4323 Colden Street Apt. 5H
Flushing, NY 11355

Re: CCRB case number 202204073

Dear Jennifer Hang:

Thank you for participating in the Civilian Complaint Review Board's mediation program. Since you mediated your complaint, the agency has closed your case file.

The purpose of mediation is to give you and the officer(s) an opportunity to speak about the incident and the complaint, to listen to each other, and to gain a better understanding of each other. The degree to which this happens is different in every case, but it happens nonetheless. We hope that you were satisfied with your participation in mediation.

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If you have any further questions about this matter, please call Caroline Hanna, Supervising Investigator of Special Operations at (212) 912-3480.

Sincerely,

Jonathan Darche
Executive Director

Exhibit 2



NYPD
New York City Police Department

LIEUTENANT CATALANO

Command

Exhibit 3